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FILED
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UNITED STATES DISTRICT COURT
DISTRICT OF ALASKA
Den

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF ALASKA

UNITED STATES OF AMERICA,)	Criminal No. F01-0014 CR
)	
Plaintiff,)	<u>COUNT 1:</u>
)	CONSPIRACY
v.)	Vio. of 18 USC 371
)	
BEXHET M. BORDONICI,)	<u>COUNTS 2,12 and 13:</u>
a.k.a. Bruno Bordonici,)	POSSESSION OF STOLEN MAIL
)	Vio. of 18 USC 1708, and 2
and)	
)	<u>COUNTS 3 and 123:</u>
RAMIZ M. BORDONICI,)	MONEY LAUNDERING
)	Vio. of 18 USC 1957
)	
Defendants.)	<u>COUNTS 4-8, 10,14,15,17,20-31, and</u>
)	<u>45:</u>
)	DISTRIBUTING CONTROLLED
)	SUBSTANCE
)	Vio. of 21 USC 841(a)(1)
)	
)	<u>COUNTS 9 and 11:</u>
)	POSSESSION OF FIREARMS
)	IN FURTHERANCE OF DRUG
)	TRAFFICKING CRIME
)	Vio. of 18 USC 924(c)

ORIGINAL

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COUNTS 16 and 18:

MONEY LAUNDERING

Vio. of 18 USC 1956(a)(3)(A)

COUNT 19:CONVICTED FELON IN POSSESSION
OF FIREARM

Vio. of 18 USC 922(g)

COUNTS 32-43, 46-48, 50, 52-99, 120-
122:USE OF INTERSTATE FACILITY
IN AID OF RACKETEERING
ENTERPRISE

Vio. of 18 USC 1952(a)(3), and 2

COUNTS 44, 49 and 51:DEBT COLLECTION BY
EXTORTIONATE MEANS

Vio. of 18 USC 894

COUNTS 100-119:

MONEY LAUNDERING

Vio. of 18 USC 1956(a)(1)(A)(i) and
(B)(i)COUNT 124:

PERJURY

Vio. of 18 USC 1621

FORFEITURE

Voi. of 18 USC 982(a)(1) &

981(a)(1)(C), 28 USC 2461, 21 USC 853
& 881(a)(7)**SUPERSEDING INDICTMENT**

THE GRAND JURY CHARGES THAT:

COUNT 1

That beginning on or about the 31st day of January, 1998, and continuing thereafter through the time of the finding of this superseding indictment, Bexhet M. Bordonici, a.k.a. Bruno Bordonici, and Ramiz M. Bordonici, named as defendants herein, did unlawfully combine, conspire, confederate and agree together and with each other and with others known and unknown to the Grand Jury, to conduct a racketeering enterprise, to wit, a prostitution enterprise in violation of state law and, in the course thereof, to use facilities in interstate commerce in aid of said racketeering enterprise, in violation of Title 18, United States Code, § 1952, to launder the proceeds of said enterprise by conducting financial transactions with said proceeds, intending thereby to promote the enterprise and to conceal the source and control of the proceeds thereof, in violation of Title 18, United States Code, § 1956, and to engage in monetary transactions in criminally derived property, in violation of Title 18, United States Code, § 1957.

It was a part of said conspiracy that the defendants would operate and participate in operating a prostitution enterprise in Fairbanks, Alaska, either directly or by leasing the premises to another for such purpose, and would utilize banking facilities in interstate commerce in aid of said enterprise and would launder the proceeds thereof.

OVERT ACTS

In furtherance of said conspiracy and to effect the object thereof, the following overt acts, among others, were committed in the District of Alaska and elsewhere:

1. On or about January 31, 1998, defendant Ramiz M. Bordonici, entered the United States as an alien and, during that year, took up residence at 3864 Peger Road, Fairbanks, where his brother, defendant Bexhet M. Bordonici, a.k.a. Bruno Bordonici, was already, and had been for some years, conducting his prostitution and narcotics enterprise under the name of Oriental Massage.

2. During the existence of this conspiracy, defendant Bexhet M. Bordonici, a.k.a. Bruno Bordonici, maintained bank accounts in Fairbanks in the names of entities generally described as Bushati's Restaurant and International Check Cashing, respectively, and conducted activities under both of those names at 511 Gaffney Road in Fairbanks, beginning in early 1998; he maintained a bank account in the name of Oriental Massage from about June 1999 to March 2001.

3. During the time of this conspiracy, defendant Bexhet M. Bordonici, a.k.a. Bruno Bordonici, obtained and held the business licenses for the entities Oriental Massage at 3864 Peger Road, International Check Cashing at 511 and another address on Gaffney Road and at 3864 Peger Road, and Bushati's Restaurant at 511 Gaffney Road, in Fairbanks.

4. On or about April 14, 1998, defendant Bexhet M. Bordonici, a.k.a. Bruno

Bordonici, entered into an agreement to purchase 511 Gaffney Road, and began making payments on said property; Bruno Bordonici subsequently asked the seller to agree to name Bruno Bordonici's brother, defendant Ramiz M. Bordonici, as the buyer of the property; the seller declined; Bruno Bordonici continued making payments on the property into the year 2001, using money consisting in large part of the proceeds of criminal activity.

5. During a substantial portion of the conspiracy, defendant Ramiz M. Bordonici managed some of the activities of International Check Cashing, and during part of that time, until about November 7, 2000, resided at the location of International Check Cashing at 511 Gaffney Road, Fairbanks.

6. During a substantial portion of the conspiracy, defendant Ramiz M. Bordonici assisted defendant Bexhet M. Bordonici, a.k.a. Bruno Bordonici, by making deposits of proceeds of the Oriental Massage enterprise into Bruno Bordonici's bank account in Fairbanks in the name of International Check Cashing.

7. On or about March 8, 2000, title to the Oriental Massage property at 3864 Peger Road, was placed in the name of defendant Ramiz M. Bordonici.

8. During March through June of 2000, defendant Bexhet M. Bordonici, a.k.a. Bruno Bordonici, loaned \$30,000 to an individual, and purchased a tract of land from said individual for an additional \$30,000, using money in whole or in large part derived from criminal activity.

9. On or about September 14th, 2000, defendants Bexhet M. Bordonici, a.k.a.

Bruno Bordonici, and Ramiz M. Bordonici used approximately \$25,000 in money derived in whole or in large part from criminal activity to purchase a GMC Yukon vehicle.

10. Following the arrest of defendant Bexhet M. Bordonici, a.k.a. Bruno Bordonici, on November 7, 2000, defendant Ramiz M. Bordonici moved from his former residence, took up residence at Oriental Massage at 3864 Peger Road, and began managing the ongoing prostitution enterprise then being conducted at that location.

11. Following his arrest on November 7, 2000, Bexhet M. Bordonici, a.k.a. Bruno Bordonici, placed telephone calls on practically a daily basis from the Fairbanks Correctional Center where he was in custody, to defendant Ramiz M. Bordonici at Oriental Massage to issue instructions for managing and operating the prostitution enterprise.

12. Approximately during March 2001, following the deposit of stolen checks into the bank account of Oriental Massage, and after measures were taken by the bank and others to recover the proceeds of such checks from said account, Bexhet M. Bordonici, a.k.a. Bruno Bordonici, instructed the bank to close the account and remit the proceeds.

13. On or about March 30, 2001, Ramiz M. Bordonici obtained the credit card of a customer of Oriental Massage and provided it to an associate Irene Louise Smithson who obtained telephone authorization for the charge against the credit card.

14. On or about April 1, 2001, Ramiz M. Bordonici shot a person at Oriental Massage during a disagreement over the price of prostitution services.

15. Following the shooting, Irene Louise Smithson took over the management of Oriental Massage from Ramiz M. Bordonici.

16. On May 1, 2001, Bexhet M. Bordonici, a.k.a. Bruno Bordonici, signed a lease for Ramiz M. Bordonici, the record owner of the Oriental Massage property at 3864 Peger Road, leasing the premises to another party for the exclusive purpose of operating the Oriental Massage business, and continuing to use the same telephone number of said business and all fixtures used in operation thereof.

17. In May 2001, at the direction of defendant Bexhet M. Bordonici, a.k.a. Bruno Bordonici, the premises at 511 Gaffney Road were leased to another party to operate a restaurant.

18. During 2001, at the direction of Bexhet M. Bordonici, a.k.a. Bruno Bordonici, proceeds of the Oriental Massage enterprise and of the lease of 511 Gaffney Road were applied to the payments for Bruno Bordonici's purchase of 511 Gaffney Road.

All of which is contrary to and in violation of Title 18, United States Code, § 371.

COUNT 2

That on or about the 25th day of September, 2000, at or near Fairbanks, in the District of Alaska, Bexhet M. Bordonici, a.k.a. Bruno Bordonici, did receive and unlawfully possess a check for approximately \$19,567.42 which had been stolen from the United States mail, the defendant knowing the same to have been stolen, all in violation of Title 18, United States Code, § 1708 and § 2.

COUNT 3

That on or about the 26th day of September, 2000, at or near Fairbanks, in the District of Alaska, Bexhet M. Bordonici, a.k.a. Bruno Bordonici, did unlawfully and knowingly engage in a monetary transaction in criminally derived property of a value greater than \$10,000, affecting interstate commerce, that is, the withdrawal of United States currency in the amount of \$17,000 from an account at Key Bank in Fairbanks, such funds having been derived from a specified unlawful activity, to wit, theft from the mail and possession of stolen mail in violation of Title 18, United States Code, § 1708, all in violation of Title 18, United States Code, § 1957.

COUNT 4

That on or about the 27th day of September, 2000, at or near Fairbanks, in the District of Alaska, Bexhet M. Bordonici, a.k.a. Bruno Bordonici, did unlawfully, knowingly, and intentionally distribute approximately 16 grams of cocaine, a Schedule II narcotic controlled substance, all in violation of Title 21, United States Code, § 841(a)(1).

COUNT 5

That on or about the 1st day of October, 2000, at or near Fairbanks, in the District of Alaska, Bexhet M. Bordonici, a.k.a. Bruno Bordonici, did unlawfully, knowingly, and intentionally distribute approximately 20 grams of cocaine, a schedule II narcotic controlled substance, all in violation of Title 21, United States Code, § 841(a)(1).

COUNT 6

That on or about the 5th day of October, 2000, at or near Fairbanks, in the District of Alaska, Bexhet M. Bordonici, a.k.a. Bruno Bordonici, did unlawfully, knowingly, and intentionally distribute approximately 20 grams of cocaine, a schedule II narcotic controlled substance, all in violation of Title 21, United States Code, § 841(a)(1).

COUNT 7

That on or about the 9th day of October, 2000, at or near Fairbanks, in the District of Alaska, Bexhet M. Bordonici, a.k.a. Bruno Bordonici, did unlawfully, knowingly, and intentionally distribute approximately 20 grams of cocaine, a schedule II narcotic controlled substance, all in violation of Title 21, United States Code, § 841(a)(1).

COUNT 8

That on or about the 13th day of October, 2000, at or near Fairbanks, in the District of Alaska, Bexhet M. Bordonici, a.k.a. Bruno Bordonici, did unlawfully, knowingly, and intentionally distribute approximately 20 grams of cocaine, a schedule II narcotic controlled substance, all in violation of Title 21, United States Code, § 841(a)(1).

COUNT 9

That between about the 16th day of October and the 20th day of October, 2000, at or near Fairbanks, in the District of Alaska, Bexhet M. Bordonici, a.k.a. Bruno Bordonici, in furtherance of a drug trafficking crime for which he may be prosecuted in a court of the United States, did unlawfully possess and brandish a firearm, to wit, a semi-automatic

pistol, all in violation of Title 18, United States Code, § 924(c).

COUNT 10

That on or about the 27th day of October, 2000, at or near Fairbanks, in the District of Alaska, Bexhet M. Bordonici, a.k.a. Bruno Bordonici, did unlawfully, knowingly, and intentionally distribute approximately 1 gram of cocaine, a schedule II narcotic controlled substance, all in violation of Title 21, United States Code, § 841(a)(1).

COUNT 11

That on or about the 27th day of October, 2000, at or near Fairbanks, in the District of Alaska, Bexhet M. Bordonici, a.k.a. Bruno Bordonici, in furtherance of a drug trafficking crime for which he may be prosecuted in a court of the United States, did unlawfully possess and brandish a firearm, to wit, a semi-automatic pistol, all in violation of Title 18, United States Code, § 924(c).

COUNT 12

That on or about the 18th day of September, 2000, at or near Fairbanks, in the District of Alaska, Bexhet M. Bordonici, a.k.a. Bruno Bordonici, did receive and unlawfully possess two checks for approximately \$470.45 and \$379.40, which had been stolen from the United States mail, the defendant knowing the same to have been stolen, all in violation of Title 18, United States Code, § 1708, and § 2.

COUNT 13

That on or about the 16th day of October, 2000, at or near Fairbanks, in the District

of Alaska, Bexhet M. Bordonici, a.k.a. Bruno Bordonici, did receive and unlawfully possess a check for approximately \$1,355.28 which had been stolen from the United States mail, the defendant knowing the same to have been stolen, all in violation of Title 18, United States Code, § 1708, and § 2.

COUNT 14

That on or about the 3rd day of November, 2000, at or near Fairbanks, in the District of Alaska, Bexhet M. Bordonici, a.k.a. Bruno Bordonici, did unlawfully, knowingly, and intentionally distribute approximately 2 grams of cocaine, a Schedule II narcotic controlled substance, all in violation of Title 21, United States Code, § 841(a)(1).

COUNT 15

That on or about the 4th day of November, 2000, at or near Fairbanks, in the District of Alaska, Bexhet M. Bordonici, a.k.a. Bruno Bordonici, did unlawfully, knowingly, and intentionally distribute approximately 5 grams of cocaine, a Schedule II narcotic controlled substance, all in violation of Title 21, United States Code, § 841(a)(1).

COUNT 16

That on or about the 4th day of November, 2000, at or near Fairbanks, in the District of Alaska, Bexhet M. Bordonici, a.k.a. Bruno Bordonici, did conduct a financial transaction involving property, to wit, \$2000 in United States currency, represented to be the proceeds of specified unlawful activity, that is, the distribution of cocaine, a Schedule II narcotic controlled substance, in violation of Title 21, United States Code, § 841(a)(1),

with the intent to promote the carrying on of specified unlawful activity, that is, the distribution of cocaine, by receiving the said \$2000 in exchange for cocaine, all in violation of Title 18, United States Code, § 1956(a)(3)(A).

COUNT 17

That on or about the 4th day of November, 2000, at or near Fairbanks, in the District of Alaska, Bexhet M. Bordonici, a.k.a. Bruno Bordonic, did unlawfully, knowingly, and intentionally distribute approximately 1 gram of cocaine, a Schedule II narcotic controlled substance, all in violation of Title 21, United States Code, § 841(a)(1).

COUNT 18

That on or about the 4th day of November, 2000, at or near Fairbanks, in the District of Alaska, Bexhet M. Bordonici, a.k.a. Bruno Bordonici, did conduct a financial transaction involving property, to wit, \$240 in United States currency, represented to be the proceeds of specified unlawful activity, that is, the distribution of cocaine, a Schedule II narcotic controlled substance, in violation of Title 21, United States Code, § 841(a)(1), with the intent to promote the carrying on of specified unlawful activity, that is, the distribution of cocaine, by receiving the said \$240 in exchange for cocaine, all in violation of Title 18, United States Code, § 1956(a)(3)(A).

COUNT 19

That on or about the 7th day of November, 2000, at or near Fairbanks, in the District of Alaska, Bexhet M. Bordonici, a.k.a. Bruno Bordonici, having theretofore been

convicted in the United States District Court for the District of Alaska, on or about March 11, 1988, and February 25, 1985, of the felony offenses of Possession of a Firearm by a Convicted Felon, and on or about October 11, 1977, of the felony offense of Conducting an Illegal Gambling Business, and having theretofore been convicted in a court of the State of California, on or about October 29, 1975, of the felony offense of Assault With a Dangerous Weapon, all of said prior convictions being crimes punishable by imprisonment for terms exceeding one year, did unlawfully possess in and affecting commerce a firearm, that is, a 9 mm. Ruger P-85 semi-automatic pistol, serial number 301-34973, all in violation of Title 18, United States Code, § 922(g)(1).

COUNT 20

That on or about the 6th day of March, 1998, at or near Fairbanks, in the District of Alaska, Bexhet M. Bordonici, a.k.a. Bruno Bordonici, did unlawfully, knowingly, and intentionally distribute approximately 20 grams of cocaine base, a Schedule II narcotic controlled substance, all in violation of Title 21, United States Code, § 841(a)(1).

COUNT 21

That on or about the 31st day of July, 1998, at or near Fairbanks, in the District of Alaska, Bexhet M. Bordonici, a.k.a. Bruno Bordonici, did unlawfully, knowingly, and intentionally distribute approximately 20 grams of cocaine base, a Schedule II narcotic controlled substance, all in violation of Title 21, United States Code, § 841(a)(1).

COUNT 22

That on or about the 4th day of January, 1999, at or near Fairbanks, in the District of Alaska, Bexhet M. Bordonici, a.k.a. Bruno Bordonici, did unlawfully, knowingly, and intentionally distribute approximately 20 grams of cocaine base, a Schedule II narcotic controlled substance, all in violation of Title 21, United States Code, § 841(a)(1).

COUNT 23

That between about the 9th day of April and 11th day of April, 1999, at or near Fairbanks, in the District of Alaska, Bexhet M. Bordonici, a.k.a. Bruno Bordonici, did unlawfully, knowingly, and intentionally distribute approximately 20 grams of cocaine base, a Schedule II narcotic controlled substance, all in violation of Title 21, United States Code, § 841(a)(1).

COUNT 24

That between about the 20th day of April and 21st day of April, 1999, at or near Fairbanks, in the District of Alaska, Bexhet M. Bordonici, a.k.a. Bruno Bordonici, did unlawfully, knowingly, and intentionally distribute approximately 20 grams of cocaine base, a Schedule II narcotic controlled substance, all in violation of Title 21, United States Code, § 841(a)(1).

COUNT 25

That between about the 10th day of June and 11th day of June, 1999, at or near Fairbanks, in the District of Alaska, Bexhet M. Bordonici, a.k.a. Bruno Bordonici, did

unlawfully, knowingly, and intentionally distribute approximately 20 grams of cocaine base, a Schedule II narcotic controlled substance, all in violation of Title 21, United States Code, § 841(a)(1).

COUNT 26

That on or about the 24th day of June, 1999, at or near Fairbanks, in the District of Alaska, Bexhet M. Bordonici, a.k.a. Bruno Bordonici, did unlawfully, knowingly, and intentionally distribute approximately 20 grams of cocaine base, a Schedule II narcotic controlled substance, all in violation of Title 21, United States Code, § 841(a)(1).

COUNT 27

That on or about the 15th day of September, 1999, at or near Fairbanks, in the District of Alaska, Bexhet M. Bordonici, a.k.a. Bruno Bordonici, did unlawfully, knowingly, and intentionally distribute approximately 20 grams of cocaine base, a Schedule II narcotic controlled substance, all in violation of Title 21, United States Code, § 841(a)(1).

COUNT 28

That between about the 19th day of September and 20th day of September, 1999, at or near Fairbanks, in the District of Alaska, Bexhet M. Bordonici, a.k.a. Bruno Bordonici, did unlawfully, knowingly, and intentionally distribute approximately 20 grams of cocaine base, a Schedule II narcotic controlled substance, all in violation of Title 21, United States Code, § 841(a)(1).

COUNT 29

That on or about the 28th day of October, 1999, at or near Fairbanks, in the District of Alaska, Bexhet M. Bordonici, a.k.a. Bruno Bordonici, did unlawfully, knowingly, and intentionally distribute approximately 20 grams of cocaine base, a Schedule II narcotic controlled substance, all in violation of Title 21, United States code, § 841(a)(1).

COUNT 30

That between about the 20th day of April and 21st day of April, 2000, at or near Fairbanks, in the District of Alaska, Bexhet M. Bordonici, a.k.a. Bruno Bordonici, did unlawfully, knowingly, and intentionally distribute approximately 20 grams of cocaine base, a Schedule II narcotic controlled substance, all in violation of Title 21, United States Code, § 841(a)(1).

COUNT 31

That on or about the 24th day of June, 2000, at or near Fairbanks, in the District of Alaska, Bexhet M. Bordonici, a.k.a. Bruno Bordonici, did unlawfully, knowingly, and intentionally distribute approximately 20 grams of cocaine base, a Schedule II narcotic controlled substance, all in violation of Title 21, United States Code, § 841(a)(1).

COUNT 32

That on or about 6th day of March, 1998, at or near Fairbanks, in the District of Alaska and elsewhere, Bexhet M. Bordonici, a.k.a. Bruno Bordonici, did use and cause to be used a facility in interstate commerce, that is, a federally insured bank, with the

intent to promote, manage, establish, and carry on, and to facilitate the promotion, management, establishment and carrying on of an unlawful activity, said unlawful activity being a business enterprise involving prostitution and narcotics, in violation of Alaska Statutes 11.66.120 and 11.66.130, and of Title 21, United States Code, § 841(a)(1), respectively, and thereafter did perform and attempt to perform acts to promote, manage, establish, and carry on, and to facilitate the promotion, management, establishment, and carrying on of said unlawful activity, by depositing in such insured bank the proceeds of said unlawful business enterprise, all in violation of Title 18, United States Code, § 1952 (a)(3), and § 2.

COUNT 33

That on or about the 31st day of July, 1998, at or near Fairbanks, in the District of Alaska and elsewhere, Bexhet M. Bordonici, a.k.a. Bruno Bordonici, did use and cause to be used a facility in interstate commerce, that is, a federally insured bank, with the intent to promote, manage, establish, and carry on, and to facilitate the promotion, management, establishment and carrying on of an unlawful activity, said unlawful activity being a business enterprise involving prostitution and narcotics, in violation of Alaska Statutes 11.66.120 and 11.66.130, and of Title 21, United States Code, § 841(a)(1), respectively, and thereafter did perform and attempt to perform acts to promote, manage, establish, and carry on, and to facilitate the promotion, management, establishment, and carrying on of said unlawful activity, by depositing in such insured bank the proceeds of

said unlawful business enterprise, all in violation of Title 18, United States Code, § 1952 (a)(3), and § 2.

COUNT 34

That on or about the 4th day of January, 1999, at or near Fairbanks, in the District of Alaska and elsewhere, Bexhet M. Bordonici, a.k.a. Bruno Bordonici, did use and cause to be used a facility in interstate commerce, that is, a federally insured bank, with the intent to promote, manage, establish, and carry on, and to facilitate the promotion, management, establishment and carrying on of an unlawful activity, said unlawful activity being a business enterprise involving prostitution and narcotics, in violation of Alaska Statutes 11.66.120 and 11.66.130, and of Title 21, United States Code, § 841(a)(1), respectively, and thereafter did perform and attempt to perform acts to promote, manage, establish, and carry on, and to facilitate the promotion, management, establishment, and carrying on of said unlawful activity, by depositing in such insured bank the proceeds of said unlawful business enterprise, all in violation of Title 18, United States Code, § 1952 (a)(3), and § 2.

COUNT 35

That between about the 9th day of April and 11th day of April, 1999, at or near Fairbanks, in the District of Alaska and elsewhere, Bexhet M. Bordonici, a.k.a. Bruno Bordonici, did use and cause to be used a facility in interstate commerce, that is, a federally insured bank, with the intent to promote, manage, establish, and carry on, and

to facilitate the promotion, management, establishment and carrying on of an unlawful activity, said unlawful activity being a business enterprise involving prostitution and narcotics, in violation of Alaska Statutes 11.66.120 and 11.66.130, and of Title 21, United States Code, § 841(a)(1), respectively, and thereafter did perform and attempt to perform acts to promote, manage, establish, and carry on, and to facilitate the promotion, management, establishment, and carrying on of said unlawful activity, by depositing in such insured bank the proceeds of said unlawful business enterprise, all in violation of Title 18, United States Code, § 1952 (a)(3), and § 2.

COUNT 36

That between about the 20th day of April and 21st day of April, 1999, at or near Fairbanks, in the District of Alaska and elsewhere, Bexhet M. Bordonici, a.k.a. Bruno Bordonici, did use and cause to be used a facility in interstate commerce, that is, a federally insured bank, with the intent to promote, manage, establish, and carry on, and to facilitate the promotion, management, establishment and carrying on of an unlawful activity, said unlawful activity being a business enterprise involving prostitution and narcotics, in violation of Alaska Statutes 11.66.120 and 11.66.130, and of Title 21, United States Code, § 841(a)(1), respectively, and thereafter did perform and attempt to perform acts to promote, manage, establish, and carry on, and to facilitate the promotion, management, establishment, and carrying on of said unlawful activity, by depositing in such insured bank the proceeds of said unlawful business enterprise, all in violation of Title 18, United States Code, § 1952 (a)(3), and § 2.

COUNT 37

That between about the 10th day of June and 11th day of June, 1999, at or near Fairbanks, in the District of Alaska and elsewhere, Bexhet M. Bordonici, a.k.a. Bruno Bordonici, did use and cause to be used a facility in interstate commerce, that is, a federally insured bank, with the intent to promote, manage, establish, and carry on, and to facilitate the promotion, management, establishment and carrying on of an unlawful activity, said unlawful activity being a business enterprise involving prostitution and narcotics, in violation of Alaska Statutes 11.66.120 and 11.66.130, and of Title 21, United States Code, § 841(a)(1), respectively, and thereafter did perform and attempt to perform acts to promote, manage, establish, and carry on, and to facilitate the promotion, management, establishment, and carrying on of said unlawful activity, by depositing in such insured bank the proceeds of said unlawful business enterprise, all in violation of Title 18, United States Code, § 1952 (a)(3), and § 2.

COUNT 38

That on or about the 24th day of June, 1999, at or near Fairbanks, in the District of Alaska and elsewhere, Bexhet M. Bordonici, a.k.a. Bruno Bordonici, did use and cause to be used a facility in interstate commerce, that is, a federally insured bank, with the intent to promote, manage, establish, and carry on, and to facilitate the promotion, management, establishment and carrying on of an unlawful activity, said unlawful activity being a business enterprise involving prostitution and narcotics, in violation of Alaska

Statutes 11.66.120 and 11.66.130, and of Title 21, United States Code, § 841(a)(1), respectively, and thereafter did perform and attempt to perform acts to promote, manage, establish, and carry on, and to facilitate the promotion, management, establishment, and carrying on of said unlawful activity, by depositing in such insured bank the proceeds of said unlawful business enterprise, all in violation of Title 18, United States Code, § 1952 (a)(3), and § 2.

COUNT 39

That on or about the 15th day of September, 1999, at or near Fairbanks, in the District of Alaska and elsewhere, Bexhet M. Bordonici, a.k.a. Bruno Bordonici, did use and cause to be used a facility in interstate commerce, that is, a federally insured bank, with the intent to promote, manage, establish, and carry on, and to facilitate the promotion, management, establishment and carrying on of an unlawful activity, said unlawful activity being a business enterprise involving prostitution and narcotics, in violation of Alaska Statutes 11.66.120 and 11.66.130, and of Title 21, United States Code, § 841(a)(1), respectively, and thereafter did perform and attempt to perform acts to promote, manage, establish, and carry on, and to facilitate the promotion, management, establishment, and carrying on of said unlawful activity, by depositing in such insured bank the proceeds of said unlawful business enterprise, all in violation of Title 18, United States Code, § 1952 (a)(3), and § 2.

COUNT 40

That between about the 19th day of September and 20th day of September, 1999, at or near Fairbanks, in the District of Alaska and elsewhere, Bexhet M. Bordonici, a.k.a. Bruno Bordonici, did use and cause to be used a facility in interstate commerce, that is, a federally insured bank, with the intent to promote, manage, establish, and carry on, and to facilitate the promotion, management, establishment and carrying on of an unlawful activity, said unlawful activity being a business enterprise involving prostitution and narcotics, in violation of Alaska Statutes 11.66.120 and 11.66.130, and of Title 21, United States Code, § 841(a)(1), respectively, and thereafter did perform and attempt to perform acts to promote, manage, establish, and carry on, and to facilitate the promotion, management, establishment, and carrying on of said unlawful activity, by depositing in such insured bank the proceeds of said unlawful business enterprise, all in violation of Title 18, United States Code, § 1952 (a)(3), and § 2.

COUNT 41

That on or about the 28th day of October, 1999, at or near Fairbanks, in the District of Alaska and elsewhere, Bexhet M. Bordonici, a.k.a. Bruno Bordonici, did use and cause to be used a facility in interstate commerce, that is, a federally insured bank, with the intent to promote, manage, establish, and carry on, and to facilitate the promotion, management, establishment and carrying on of an unlawful activity, said unlawful activity being a business enterprise involving prostitution and narcotics, in violation of Alaska

Statutes 11.66.120 and 11.66.130, and of Title 21, United States Code, § 841(a)(1), respectively, and thereafter did perform and attempt to perform acts to promote, manage, establish, and carry on, and to facilitate the promotion, management, establishment, and carrying on of said unlawful activity, by depositing in such insured bank the proceeds of said unlawful business enterprise, all in violation of Title 18, United States Code, § 1952 (a)(3), and § 2.

COUNT 42

That between about the 20th day of April and 21st day of April, 2000, at or near Fairbanks, in the District of Alaska and elsewhere, Bexhet M. Bordonici, a.k.a. Bruno Bordonici, did use and cause to be used a facility in interstate commerce, that is, a federally insured bank, with the intent to promote, manage, establish, and carry on, and to facilitate the promotion, management, establishment and carrying on of an unlawful activity, said unlawful activity being a business enterprise involving prostitution and narcotics, in violation of Alaska Statutes 11.66.120 and 11.66.130, and of Title 21, United States Code, § 841(a)(1), respectively, and thereafter did perform and attempt to perform acts to promote, manage, establish, and carry on, and to facilitate the promotion, management, establishment, and carrying on of said unlawful activity, by depositing in such insured bank the proceeds of said unlawful business enterprise, all in violation of Title 18, United States Code, § 1952 (a)(3), and § 2.

COUNT 43

That on or about the 24th day of June, 2000, at or near Fairbanks, in the District of Alaska and elsewhere, Bexhet M. Bordonici, a.k.a. Bruno Bordonici, did use and cause to be used a facility in interstate commerce, that is, a federally insured bank, with the intent to promote, manage, establish, and carry on, and to facilitate the promotion, management, establishment and carrying on of an unlawful activity, said unlawful activity being a business enterprise involving prostitution and narcotics, in violation of Alaska Statutes 11.66.120 and 11.66.130, and of Title 21, United States Code, § 841(a)(1), respectively, and thereafter did perform and attempt to perform acts to promote, manage, establish, and carry on, and to facilitate the promotion, management, establishment, and carrying on of said unlawful activity, by depositing in such insured bank the proceeds of said unlawful business enterprise, all in violation of Title 18, United States Code, § 1952 (a)(3), and § 2.

COUNT 44

That between about the about 1st day of August and about the 31st day of August, 2000, in the District of Alaska, Bexhet M. Bordonici, a.k.a. Bruno Bordonici, did participate in the use of extortionate means within the meaning of Title 18, United States Code, § 891(7), to collect and attempt to collect an extension of credit; that is, the defendant did unlawfully and knowingly, expressly and implicitly, threaten the use of criminal means to cause harm to the person, reputation, and property of the supposed

debtor, in order to collect and attempt to collect an extension of credit within the meaning of Title 18, United States Code, § 891, from the supposed debtor, all in violation of Title 18, United States Code, § 894.

COUNT 45

That on or about the 22nd day of February, 1999, at or near Fairbanks, in the District of Alaska, Bexhet M. Bordonici, a.k.a. Bruno Bordonici, did unlawfully, knowingly, and intentionally distribute cocaine, a Schedule II narcotic controlled substance, all in violation of Title 21, United States Code, § 841(a)(1).

COUNT 46

That on or about 22nd day of February, 1999, at or near Fairbanks, in the District of Alaska and elsewhere, Bexhet M. Bordonici, a.k.a. Bruno Bordonici, did use and cause to be used a facility in interstate commerce, that is, a federally insured bank, with the intent to promote, manage, establish, and carry on, and to facilitate the promotion, management, establishment and carrying on of an unlawful activity, said unlawful activity being a business enterprise involving prostitution and narcotics, in violation of Alaska Statutes 11.66.120 and 11.66.130, and Title 21, United States Code, 841(a)(1), respectively, and thereafter did perform and attempt to perform acts to promote, manage, establish, and carry on, and to facilitate the promotion, management, establishment, and carrying on of said unlawful activity, by depositing in such insured bank the proceeds of said unlawful business enterprise, all in violation of Title 18, United States Code, § 1952

(a)(3), and § 2.

COUNT 47

That on or about 12th day of March, 1999, at or near Fairbanks, in the District of Alaska and elsewhere, Bexhet M. Bordonici, a.k.a. Bruno Bordonici, did use and cause to be used a facility in interstate commerce, that is, a federally insured bank, with the intent to promote, manage, establish, and carry on, and to facilitate the promotion, management, establishment and carrying on of an unlawful activity, said unlawful activity being a business enterprise involving prostitution, in violation of Alaska Statutes 11.66.120 and 11.66.130, and thereafter did perform and attempt to perform acts to promote, manage, establish, and carry on, and to facilitate the promotion, management, establishment, and carrying on of said unlawful activity, by depositing in such insured bank the proceeds of said unlawful business enterprise, all in violation of Title 18, United States Code, § 1952 (a)(3), and § 2.

COUNT 48

That on or about 29th day of April, 1999, at or near Fairbanks, in the District of Alaska and elsewhere, Bexhet M. Bordonici, a.k.a. Bruno Bordonici, did use and cause to be used a facility in interstate commerce, that is, a federally insured bank, with the intent to promote, manage, establish, and carry on, and to facilitate the promotion, management, establishment and carrying on of an unlawful activity, said unlawful activity being a business enterprise involving prostitution, in violation of Alaska Statutes 11.66.120

and 11.66.130, and thereafter did perform and attempt to perform acts to promote, manage, establish, and carry on, and to facilitate the promotion, management, establishment, and carrying on of said unlawful activity, by depositing in such insured bank the proceeds of said unlawful business enterprise, all in violation of Title 18, United States Code, § 1952 (a)(3), and § 2.

COUNT 49

That on or about the 29th day of April, 1999, in the District of Alaska, Bexhet M. Bordonici, a.k.a. Bruno Bordonici, did participate in the use of extortionate means within the meaning of Title 18, United States Code, § 891(7), to collect and attempt to collect an extension of credit; that is, the defendant did unlawfully and knowingly, expressly and implicitly, threaten the use of criminal means to cause harm to the person, reputation, and property of the supposed debtor, in order to collect and attempt to collect an extension of credit within the meaning of Title 18, United States Code, § 891, from the supposed debtor, all in violation of Title 18, United States Code, § 894.

COUNT 50

That on or about 19th day of May, 1999, at or near Fairbanks, in the District of Alaska and elsewhere, Bexhet M. Bordonici, a.k.a. Bruno Bordonici, did use and cause to be used a facility in interstate commerce, that is, a federally insured bank, with the intent to promote, manage, establish, and carry on, and to facilitate the promotion, management, establishment and carrying on of an unlawful activity, said unlawful activity

being a business enterprise involving prostitution, in violation of Alaska Statutes 11.66.120 and 11.66.130, and thereafter did perform and attempt to perform acts to promote, manage, establish, and carry on, and to facilitate the promotion, management, establishment, and carrying on of said unlawful activity, by depositing in such insured bank the proceeds of said unlawful business enterprise, all in violation of Title 18, United States Code, § 1952 (a)(3), and § 2.

COUNT 51

That on or about the 19th day of May, 1999, in the District of Alaska, Bexhet M. Bordonici, a.k.a. Bruno Bordonici, did participate in the use of extortionate means within the meaning of Title 18, United States Code, § 891(7), to collect and attempt to collect an extension of credit; that is, the defendant did unlawfully and knowingly, expressly and implicitly, threaten the use of criminal means to cause harm to the person, reputation, and property of the supposed debtor, in order to collect and attempt to collect an extension of credit within the meaning of Title 18, United States Code, § 891, from the supposed debtor, all in violation of Title 18, United States Code, § 894.

COUNT 52

That on or about 14th day of September, 1999, at or near Fairbanks, in the District of Alaska and elsewhere, Bexhet M. Bordonici, a.k.a. Bruno Bordonici, did use and cause to be used a facility in interstate commerce, that is, a federally insured bank, with the intent to promote, manage, establish, and carry on, and to facilitate the promotion,

management, establishment and carrying on of an unlawful activity, said unlawful activity being a business enterprise involving prostitution, in violation of Alaska Statutes 11.66.120 and 11.66.130, and thereafter did perform and attempt to perform acts to promote, manage, establish, and carry on, and to facilitate the promotion, management, establishment, and carrying on of said unlawful activity, by depositing in such insured bank the proceeds of said unlawful business enterprise, all in violation of Title 18, United States Code, § 1952 (a)(3), and § 2.

COUNT 53

That on or about 30th of October, 1999, at or near Fairbanks, in the District of Alaska and elsewhere, Bexhet M. Bordonici, a.k.a. Bruno Bordonici, did use and cause to be used a facility in interstate commerce, that is, a federally insured bank, with the intent to promote, manage, establish, and carry on, and to facilitate the promotion, management, establishment and carrying on of an unlawful activity, said unlawful activity being a business enterprise involving prostitution, in violation of Alaska Statutes 11.66.120 and 11.66.130, and thereafter did perform and attempt to perform acts to promote, manage, establish, and carry on, and to facilitate the promotion, management, establishment, and carrying on of said unlawful activity, by depositing in such insured bank the proceeds of said unlawful business enterprise, all in violation of Title 18, United States Code, § 1952 (a)(3), and § 2.

COUNT 54

That on or about 13th day of November, 1999, at or near Fairbanks, in the District of Alaska and elsewhere, Bexhet M. Bordonici, a.k.a. Bruno Bordonici, did use and cause to be used a facility in interstate commerce, that is, a federally insured bank, with the intent to promote, manage, establish, and carry on, and to facilitate the promotion, management, establishment and carrying on of an unlawful activity, said unlawful activity being a business enterprise involving prostitution, in violation of Alaska Statutes 11.66.120 and 11.66.130, and thereafter did perform and attempt to perform acts to promote, manage, establish, and carry on, and to facilitate the promotion, management, establishment, and carrying on of said unlawful activity, by depositing in such insured bank the proceeds of said unlawful business enterprise, all in violation of Title 18, United States Code, § 1952 (a)(3), and § 2.

COUNT 55

That on or about 27th day of November, 1999, at or near Fairbanks, in the District of Alaska and elsewhere, Bexhet M. Bordonici, a.k.a. Bruno Bordonici, did use and cause to be used a facility in interstate commerce, that is, a federally insured bank, with the intent to promote, manage, establish, and carry on, and to facilitate the promotion, management, establishment and carrying on of an unlawful activity, said unlawful activity being a business enterprise involving prostitution, in violation of Alaska Statutes 11.66.120 and 11.66.130, and thereafter did perform and attempt to perform acts to promote,